## REMARKS

Claims 1-6 remain in the application. By the present amendment claims 1-4 and 6 have been amended, and new independent claim 7 has been added. The claims have been carefully reviewed and amended with particular attention to the points raised in the Office Action. It is submitted that no new matter has been added and no new issues have been raised by the present amendment.

An Abstract on a separate sheet is submitted herewith as required by the Office Action, in the Appendix attached following page 10 of this paper.

Reconsideration is respectfully requested of the rejection of claims 1-6 under 35 U.S.C. § 102(e), as allegedly being anticipated by U.S. Patent No. 6,111,857 to Soliman et al.

Applicants have carefully considered the comments of the Office Action and the cited reference, and respectfully submit that claims 1-6 are patentably distinct over the cited reference for at least the following reasons.

The present invention relates to a method for automatically designing cellular mobile radio telephone networks. A design of a cellular mobile radio telephone network or subnetwork for a new planning area is automatically generated using available planning data for existing, planned, or abstract cellular mobile radio telephone networks and the space-related data of their planning areas and the space-related data of the new planning area. Relationships between the space-related reference and planning data are processed,

and coordinate and angle transformations are applied to the site coordinates of the base stations and main beam directions of antennae of the base stations of the reference data.

Soliman et al., as understood by Applicants, relates to a method and apparatus for planning a wireless telecommunications network. An electronic representation of a wireless telecommunications system can be configured within a given market area and the operation of the wireless telecommunications system simulated. The simulation is performed using a set of databases that contain terrain and population information associated with the market area over which the wireless network is configured. To perform the simulation a composite propagation loss matrix and a demand and service vector are generated using the terrain and population information, as well as the configuration of the wireless telecommunications network. Once the composite propagation loss matrix and the demand and service vector are generated, analyses of the reverse link and of the forward link are performed. During both the reverse and forward link analyses multiple iterations are performed until a stable result is achieved. Upon completion of the reverse and forward link analyses, the results of the simulation are displayed in a graphical manner for examination.

The Office Action states that "[r]egarding claims 1, 5, Soliman et al. discloses all of the claimed invention as set forth in the instant application ... " (see Office Action, p. 3, lns. 14-15). Applicants respectfully disagree.

As understood by Applicants, Soliman et al. discloses the

use of a computer and display screen to store, process, and display data for performing the above-mentioned wireless network planning (see Soliman et al., col. 5, lns. 11-59; Figs. 1-2). These data include electronic representations of geographic and other environmental information about a specific market area over which simulation of the operation of the wireless network is to be performed (see id., lns. 60-64). Such geographic and environmental information may include altitude and terrain information associated with an evenly-spread set of x-y coordinates, referred to as "bins" (see id., lns. 64-67; col. 7, lns. 13-29). Additionally, the data include an electronic representation of the layout of a wireless telephone system (see id., col. 6, lns. 1-2).

The environmental information, as understood by Applicants, is displayed on the display screen of the computer to form a graphical representation of the terrain of the simulation area (see id., lns. 20-59; Fig. 3). Simulation parameters may be entered by a user via a menu bar and dialog boxes, and base stations may be located and moved on the display screen through use of a mouse and cursor (see id.).

The simulation is performed by the computer and includes generation of a propagation loss array, initialization of a demand and service vector, and performance of reverse and forward link analyses (see id., col. 7, lns. 13-64; Fig. 4).

After the base stations have been located, the simulation is performed and the results displayed on the display screen in various formats (see id., col. 6, lns. 59-65; col. 8, lns. 2-5).

In contrast, in the present invention, a design of a cellular mobile radio telephone network or subnetwork for a new planning area is automatically generated from previously-produced planning data of implemented, planned, or abstract cellular mobile radio telephone networks, the space-related data of their planning areas, and the space-related data of the new planning area, by processing relations between the space-related reference data and the space-related data of the new planning area, and by applying coordinate transformations to the site coordinates of the base stations and main beam directions of antennas of base stations of the reference data (see specification of the present application, p. 5, lns. 3-15).

That is, in the present invention, in planning a new telecommunications network, space-related and network-related data of another, already-planned communications network are used. The present invention utilizes as a basis an assumption that geographic areas having identical space-related features can be supplied by mobile radio telephone networks or subnetworks which are identical apart from space-related parameters such as coordinates of base stations and main beam directions of antennas, and that therefore two geographic areas having identical space-related features can be represented by identical space-related data contents which can be processed by machine (see id., p. 9, lns. 4-13).

As described above, as understood by Applicants, in the system of Soliman et al. only the space-related data of the new planning area are used for performing the simulation.

It is respectfully submitted that Soliman et al. does not disclose or suggest a method for automatically designing cellular mobile radio telephone networks, wherein, from existing planning data of implemented, planned or abstract cellular mobile radio telephone networks or subnetworks and the space-related data of their planning areas, including network-related and space-related reference data, and the space-related data of a new planning area, a design of the cellular mobile radio telephone network or subnetwork for the new planning area is automatically generated by processing the relationships between the space-related reference and the space-related data of the new planning area and application of coordinate and angle transformations to the site coordinates of the base stations and main beam directions of the antennas of the base stations of the reference data, as recited in independent claim 1.

Accordingly, for at least the above-stated reasons, it is respectfully submitted that independent claim 1, and the claims depending therefrom, are patentable over the cited reference.

Should the Examiner disagree, it is respectfully requested that the Examiner specify where in the cited document there is a basis for such disagreement.

The references made of record and not relied upon have been reviewed and are not seen to show or suggest the present invention, as recited in the amended claims.

The Office is hereby authorized to charge any fees which may be required in connection with this Amendment and to

credit any overpayment to Deposit Account No. 03-3125.

Favorable reconsideration is earnestly solicited.

Dated: September 29, 2003

I hereby certify that this paper is being deposited this date with the U.S. Postal Service as first class Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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